

1 ROGER P. CROTEAU, ESQ.  
Nevada Bar No. 4958  
2 TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
3 ROGER P. CROTEAU & ASSOCIATES, LTD.  
9120 West Post Road, Suite 100  
4 Las Vegas, Nevada 89148  
(702) 254-7775  
5 (702) 228-7719 (facsimile)  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
6 *Attorney for Defendant*  
AIRMOTIVE INVESTMENTS, LLC

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 \*\*\*

10 DITECH FINANCIAL LLC F/K/A GREEN )  
11 TREE SERVICING LLC AND FEDERAL )  
12 NATIONAL MORTGAGE ASSOCIATION, )  
Plaintiffs, )

13 vs. )

14 STONEFIELD II HOMEOWNERS )  
15 ASSOCIATION, AIRMOTIVE )  
16 INVESTMENTS, LLC )

17 Defendants. )

18 AIRMOTIVE INVESTMENTS, LLC, a Nevada )  
19 limited liability company, )

20 Counterclaimant, )

21 vs. )

22 DITECH FINANCIAL LLC f/k/a GREEN )  
23 TREE SERVICING LLC, a Delaware limited )  
24 liability company; FEDERAL NATIONAL )  
25 MORTGAGE ASSOCIATION, a federally )  
26 chartered corporation; ANA RODRIGUEZ f/k/a )  
27 ANA PUENTES, an individual; DOE )  
28 individuals I through XX; and ROE )  
CORPORATIONS I through XX, )

Counter-Defendants. )

Case No. 3:16-cv-00227-MMD-WGC

**STIPULATION AND ORDER TO**  
**EXTEND TIME TO RESPOND TO**  
**MOTION FOR SUMMARY**  
**JUDGMENT (Second Request)**

**STIPULATION AND ORDER TO EXTEND TIME TO  
RESPOND TO MOTION FOR SUMMARY JUDGMENT**  
**(Second Request)**

COMES NOW Plaintiffs, DITECH FINANCIAL LLC f/k/a GREEN TREE SERVICING LLC and FEDERAL NATIONAL MORTGAGE ASSOCIATION, and Defendant, AIRMOTIVE INVESTMENTS, LLC, by and through their undersigned counsel, and hereby stipulate and agree as follows:

1. On November 20, 2018, Plaintiffs filed a Motion for Partial Summary Judgment herein [ECF #60]. A response was due on December 11, 2018.
2. On December 11, 2018, the Parties stipulated herein to extend the responsive deadline for 30 days [ECF #62].
3. This Court granted the Parties' stipulation, and ordered that any opposition to the Motion would be extended until January 11, 2019.
4. As a result of the holidays and family obligations associated therewith, Defendant's counsel has been required to devote time and attention to numerous other pending legal matters since the filing of the Motion for Summary Judgment which have detracted from the time available prepare a response. Specifically, Defendant's counsel has been required to prepare several appellate briefs and respond to numerous summary judgment motions that have been filed in various cases over the course of the past several weeks.
5. Defendant has requested and shall be granted an extension of time until January 25, 2019, in which to respond to the Plaintiffs' Motion for Summary Judgment.
6. Plaintiffs have requested and shall be granted an extension of time in which to file any Reply. Plaintiffs shall file any Reply brief within 21 days after Defendant's Response is filed.

//

//

//

//

7. This Stipulation is made in good faith and not for purpose of delay.

Dated this 11<sup>th</sup> day of January, 2019.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

AKERMAN, LLP

/s/ Timothy Rhoda  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
9120 West Post Road, Suite 100  
Las Vegas, Nevada 89148  
(702) 254-7775  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Defendant*  
*Airmotive Investments, LLC*

/s/ Rex Garner  
REX D. GARNER, ESQ.  
Nevada Bar No. 9401  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
702-634-5000  
702-380-8572 (fax)  
[Rex.garner@akerman.com](mailto:Rex.garner@akerman.com)  
*Attorney for Plaintiffs*  
*Ditech Financial, LLC and Federal*  
*National Mortgage Association*

IT IS SO ORDERED.

By: 

Judge, U.S. District Court

Dated: January 11, 2019

**ROGER P. CROTEAU & ASSOCIATES, LTD.**

• 9120 W. Post Road, Suite 100 • Las Vegas, Nevada 89148 •  
Telephone: (702) 254-7775 • Facsimile (702) 228-7719

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11<sup>th</sup> day of January, 2019, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT (Second Request)** to the following parties:

Rex Garner  
Akerman LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
[rex.garner@akerman.com](mailto:rex.garner@akerman.com)  
*Attorney for Plaintiffs  
Ditech Financial, LLC and  
Federal National Mortgage  
Association*

Ariel E. Stern  
Akerman LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
702-634-5000  
702-380-8572 (fax)  
[ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)  
*Attorney for Plaintiffs  
Ditech Financial, LLC and  
Federal National Mortgage  
Association*

Adam H Clarkson  
The Clarkson Law Group, P.C.  
2300 West Sahara Avenue, Suite 950  
Las Vegas, NV 89102  
702-462-5700  
702-446-6234 (fax)  
[aclarkson@the-clg.com](mailto:aclarkson@the-clg.com)  
*Attorney for Defendant  
Stonefield II Homeowners Association*

Thomas E. McGrath  
Tyson & Mendes, LLP  
8275 South Eastern Ave., Ste. 115  
Las Vegas, NV 89123  
702-724-2648  
702-938-1048 (fax)  
[tmcgrath@tysonmendes.com](mailto:tmcgrath@tysonmendes.com)  
*Attorney for Defendant  
Stonefield II Homeowners Association*

Christopher Ammon Lund  
Tyson & Mendes LLP  
8275 South Eastern Avenue  
Suite 115  
Las Vegas, NV 89123  
702-724-2648  
702-938-1048 (fax)  
[clund@tysonmendes.com](mailto:clund@tysonmendes.com)  
*Attorney for Defendant  
Stonefield II Homeowners Association*

/s/ Timothy E. Rhoda  
An employee of ROGER P. CROTEAU &  
ASSOCIATES, LTD.